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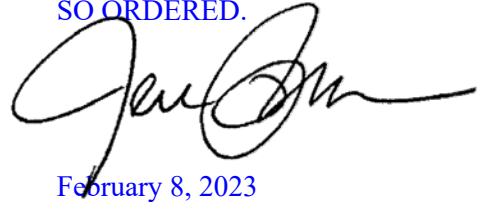
February 7, 2023

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. Any opposition to the motion to seal must be filed by **February 13, 2023**. The Clerk of Court is directed to terminate ECF No. 61.

VIA ECF

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

SO ORDERED.



February 8, 2023

Re: **Motion to Seal Portions of Declaration of Rae Young (Lae) Jang**  
**Koh v. Koo, Case No. 1:22-cv-06639.**

Dear Judge Furman:

Defendants submit this motion to seal portions of the Declaration of Rae Young (Lae) Jang in support of Defendants Maum Holdings, Inc. and Maum Capital Group Inc.'s Motion to Dismiss Second Amended Complaint, including exhibit 6 to the Jang Declaration.

Although “[t]he common law right of public access to judicial documents is firmly rooted in our nation's history,” this right is not absolute, and courts “must balance competing considerations against” the presumption of access. *Lugosch v. Pyramid Co. v. Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Here, filing the Jang Declaration in redacted form is necessary to prevent the dissemination of confidential business information including commercial information about third parties and corporate financial information that is non-public and which, if disseminated, would put the referenced companies at a competitive disadvantage. *See, e.g., Ghouneim v. 352-354 H.D.F.C.*, 2019 WL 1523326, at \*5 (S.D.N.Y. 2019) (sealing ECF submissions “to protect sensitive personal and financial information”). Accordingly, Defendants request that the Court seal the requested portions of the Declaration of Rae Young (Lae) Jang in support of Defendants Maum Holdings, Inc. and Maum Capital Group Inc.'s Motion to Dismiss Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, including exhibit 6.

Respectfully submitted,

/s/ Brian Danitz  
BRIAN DANITZ

Encl.

cc: All counsel of record